

December 2, 2016

Ex Parte Notice

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42 – Q LINK WIRELESS LLC, Petition for Designation as a Lifeline Broadband Provider

Dear Ms. Dortch:

On December 1, 2016, I met with Matt DelNero and Ryan Palmer of the Wireline Competition Bureau regarding Q LINK's Petition for Designation as a Lifeline Broadband Provider ("LBP")¹ and its response² to the filing³ by the Public Utility Division of the Oklahoma Corporation Commission ("PUD"). I stated that Q LINK has addressed all concerns with respect to Oklahoma ZIP codes, which was the only specific point raised by anyone with respect to Q LINK's Petition. As documented in its Petition, Q LINK has had an exemplary record as a Lifeline provider in 27 states. It has, to date, been through 21 government or USAC reviews, without a finding of a single duplicate Lifeline household.⁴ It has a highly automated, rigorous system for verifying the identity and eligibility of its customers, which includes multiple checks against NLAD, USPS, Melissa, Lexis/Nexis, and CGM databases. It has in place and utilizes a compliance staff that reviews each Lifeline application received, and it ships only to a customer's verified residential address. It does not employ street agents. It has been highly successful in reaching out to unserved and underserved low income consumers: eighty-five percent (85%) of its customers are *new* and did not previously participate in the Lifeline

¹ See Q LINK WIRELESS LLC Petition for Designation as a Lifeline Broadband Provider, WC Docket Nos. 11-42, 09-197 (filed Sept. 22, 2016) ("LBP Petition").

² Letter from John T. Nakahata, Counsel to Q LINK WIRELESS LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 09-197, 11-42 (filed Nov. 30, 2016).

³ See Response of the Public Utility Division of the Oklahoma Corporation Commission to Q LINK WIRELESS, LLC's Supplement to Petition of Q LINK WIRELESS LLC for FCC Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier, WC Docket Nos. 09-197, 11-42 (filed Nov. 15, 2016).

⁴ LBP Petition at 4.

Ms. Marlene H. Dortch

December 2, 2016

Page 2 of 2

program. It has invested in best-in-class customer service, satisfaction and retention, with the lowest churn rate in the industry.

At this point, there is no reason to withhold grant of Q LINK's LBP application. Q LINK has been seeking ETC designations for the FCC-designated states for more than 5 years. At this point, with the Bureau granting LBP designations to some companies – including at least one of a comparable scope – Q LINK is being unfairly prejudiced and held out of these markets. because its LBP application has not yet been granted.

Please contact me if there are any questions.

Sincerely,



John T. Nakahata

Counsel to Q LINK WIRELESS LLC

jnakahata@hwglaw.com

(202) 730-1320

cc: Matthew DelNero
Ryan Palmer